

The Honorable Richard A. Jones
United States District Court Judge

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WASHINGTON ELECTION INTEGRITY
COALITION UNITED, a Washington State
Nonprofit Corporation; DOUG BASLER;
HOWARD FERGUSON; DIANA BASS;
TIMOFEY SAMOYLENKO; MARY
HALLOWELL; SAMANTHA BUCARI;
RONALD STEWART; LYDIA ZIBIN;
CATHERINE DODSON,

Plaintiffs,

v.

JULIE WISE, Directory of King County
Elections; KING COUNTY, and DOES
1-30, inclusive,

Defendants.

No. 2:21-cv-01394-RAJ

**DECLARATION OF DAVID J.
HACKETT IN SUPPORT OF
DEFENDANTS' MOTION FOR
RULE 11 SANCTIONS**

I, DAVID J. HACKETT, declare under penalty of perjury under the laws of the State of
Washington as follows:

1. I am a King County Senior Deputy Prosecuting Attorney and one of the assigned
attorneys for King County in this case. I am over eighteen years of age. I have personal
knowledge of the facts contained in this declaration and am otherwise competent to
testify to the matters in this declaration.

DECLARATION OF DAVID J. HACKETT IN
SUPPORT OF DEFENDANTS' MOTION FOR
RULE 11 SANCTIONS - 1

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- 1 2. On October 22, 2021, King County mailed a copy of its proposed Fed. R. Civ. P. 11
2 motion to the Plaintiffs in this matter via First Class U.S. Mail. A cover letter informed
3 Plaintiffs that the motion was being filed under Rule 11 and that King County was
4 seeking sanctions, but that Rule 11(c) provided them “with a 21-day period to cure the
5 deficiencies in your complaint, dismiss it, decide to adhere to its terms, or take other
6 action that you may deem appropriate.” The letter further scheduled a zoom conference
7 call for November 15, 2021 at 10:00 a.m. to meet and confer regarding the Rule 11
8 motion and informed Plaintiffs that their participation in the meet and confer was
9 required by this Court’s general order. A copy of the letter with the attached proposed
10 Rule 11 motion is attached as Exhibit 1.
- 11 3. As scheduled, the undersigned convened a meet and confer conference by Zoom on
12 November 15, 2021 at 10:00 a.m. For Plaintiffs, those present at the conference were
13 WEICU Attorney Virginia Shogren, Tim Samoylenko, Doug Basler, Cathy Dodson,
14 and Lydia Zibin. The remaining pro se Plaintiffs did not attend despite the adequate
15 advance notice, nor did any ask to reschedule the meeting. For Defendants, Ann
16 Summers, Mari Isaacson, Jennifer Revak and myself were present.
- 17 4. I explained the basis for Defendants’ Rule 11 motion. Ms. Shogren indicated her belief
18 that Rule 11 did not apply to Plaintiffs’ Complaint because it was filed in state court. I
19 disagreed with this analysis and pointed out that a similar version of Rule 11 applies in
20 state court. She further stated that no motions could be heard by the District Court prior
21 to her remand motion. I also stated my disagreement with this position. We concurred
22 that we would not be able to reach agreement on these and other legal points. I
23 confirmed with Ms. Shogren that WEICU was not joining the non-public record act

1 claims in the complaint. However, Ms. Shogren pointed out that WEICU was
2 specifically joining the factual allegations in the complaint as stated in paragraph 49.
3 Finally, I asked the individual Plaintiffs if they had any questions or concerns about the
4 Rule 11 motion. No one spoke. Unsure if my computer equipment was working, I
5 posed the question again and confirmed that I was heard. Again, no one spoke.

6 DATED this 18th day of November, 2021.

7 
8 DAVID J. HACKETT

EXHIBIT 1

**DECLARATION OF DAVID J. HACKETT IN SUPPORT OF
DEFENDANTS' MOTION FOR RULE 11 SANCTIONS**

EXHIBIT 1

KING COUNTY PROSECUTING ATTORNEY'S OFFICE



DANIEL T. SATTERBERG
PROSECUTING ATTORNEY

JUSTICE
COMPASSION
PROFESSIONALISM
INTEGRITY
LEADERSHIP

October 22, 2021

Doug Basler
1851 Central Place S, Suite 123
Kent, WA 98032

Re: *WEICU, et al. v. Wise, et al.*, No. 2:21-cv-01394-RAJ

Mr. Basler,

In accord with the enclosed motion, King County believes that your complaint was signed and verified contrary to the requirements of Federal Rule of Civil Procedure 11. King County will be asking the Court to award sanctions against each of you jointly and severally. The enclosed motion details the reasons that we believe your complaint to be legally and factually frivolous. In accord with Rule 11(c), you are being provided with a 21-day period to cure the deficiencies in your complaint, dismiss it, decide to adhere to its terms, or take other action that you may deem appropriate.

On November 15, 2021, we have scheduled a Zoom call at 10:00 a.m. to meet and confer regarding King County's plan to file the attached motion to sanction plaintiffs under Rule 11. Your participation in this process is required by the Court's general order. We look forward to discussing and understanding your position. In order to join the Zoom meeting, please call the following number: (253) 215 8782. The meeting ID is 853 9223 5881. The meeting passcode is 453285.

If you would like the invitation to this meeting to be sent to you via email, please email Ms. Kris Bridgman at kris.bridgman@kingcounty.gov. If you have any difficulty, please call Ms. Bridgman at (206) 477-1261.

Thank you for your attention to this matter.

Sincerely,

David Hackett
Senior Deputy Prosecuting Attorney
Attorney for King County Defendants

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WASHINGTON ELECTION INTEGRITY)
COALITION UNITED, a Washington State)
Nonprofit Corporation; DOUG BASLER;) No. 2:21-cv-01394-RAJ
HOWARD FERGUSON; DIANA BASS;)
TIMOFEY SAMOYLENKO; AMY BEHOPE;)
MARY HALLOWELL; SAMANTHA BUCARI;) KING COUNTY DEFENDANTS'
RONALD STEWART; LYDIA ZIBIN;) MOTION FOR SANCTIONS UNDER
CATHERINE DODSON,) RULE 11
Plaintiffs,)
v.) *Noted for:*
JULIE WISE, Directory of King County)
Elections; KING COUNTY, and DOES)
1-30, inclusive,)
Defendants.)

I. IDENTIFY OF MOVING PARTY AND RELIEF REQUESTED

Spurious and destructive allegations about election integrity attack the heart of our democracy. Making such allegations “without a valid legal basis or serious independent personal investigation into the facts [is] the height of recklessness.” *O'Rourke v. Dominion Voting Sys. Inc.*, ___ F.Supp.3d ___, 2021 WL 3400671, at *24 (D. Colo. Aug. 3, 2021). The misuse of the courts to perpetuate groundless conspiracy theories about the 2020 election similar to those proffered by Plaintiffs has caused two federal courts to impose sanctions under Fed. R. Civ. P. 11. *See Id.* (Sanctions awarded because election “lawsuit was filed with a woeful lack of

1 investigation into the law and (under the circumstances) the facts.”); *King v. Whitmer*, __
2 F.Supp.3d ___, 2021 WL 3771875, at *1 (E.D. Mich. Aug. 25, 2021) (Imposing sanctions on
3 plaintiff’s attorneys, Sidney Powell and others, for “a historic and profound abuse of the judicial
4 process.”). Because Plaintiffs have each signed and verified a complaint predicated on legal
5 theories and factual averments that blatantly violate Fed. R. Civ. P. 11, Julie Wise and King
6 County (“King County Defendants”) respectfully request imposition of sanctions under Rule 11
7 against each Plaintiff personally.

8 II. FACTS

9 Seeking to perpetuate the “Big Lie” that has recently infected American civic life,¹
10 Plaintiff’s complaint alleges that Elections Director Julie Wise and King County engaged in a
11 nefarious plot to rig the 2020 election. Throughout their conspiracy laden complaint, Plaintiffs²
12 allege that Director Wise used “an uncertified voting system, allowing or facilitating vote
13 flipping, additions and/or deletions, and allowing or facilitating party preference tracking and/or
14 ballot identification.” Dkt. ___ (Complaint ¶5). None of Plaintiffs assert any personal
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17 ¹ The Big Lie refers to efforts by former President Trump and others to claim that the 2020
18 election was stolen from him despite overwhelming evidence to the contrary. *See generally*
19 Zachary B. Wolf, *The 5 Key Elements of Trump’s Big Lie and How It Came to Be*, CNN (May
20 19, 2021)(last accessed on 10/15/2021 at <https://www.cnn.com/2021/05/19/politics/donald-trump-big-lie-explainer/index.html>); Alison Durkee, “Big Lie” Election Audits Go On After
21 Arizona: Here’s What’s Happening in Wisconsin, Pennsylvania-And Now Texas,” *Forbes* (Sept.
22 26, 2021 (Last accessed on 10/18/2021 at <https://www.forbes.com/sites/alisondurkee/2021/09/26/big-lie-election-audits-go-on-after-arizona-heres-whats-happening-in-wisconsin-pennsylvania-and-now-texas/?sh=2d4fe6132f43>)).

23 ² The complaint identifies certain claims as being brought by “Citizen Plaintiffs v. Director,” while the claim under Washington’s Public Records Act (“PRA”), chapter 42.56 RCW is brought by “Plaintiff WEiCU v. Director and County.” Although Plaintiff WEiCU’s formal claim is limited to the PRA, its Director, Tamborine Borrelli, nonetheless signs the entire complaint and personally swears to the veracity of the entire complaint. As such, this motion is brought against all Plaintiffs in this action.

1 knowledge in support of the complaint's rash allegations. Instead, they assert that that they "are
2 informed and believe and thereon allege" *E.g., id.* at ¶¶ 14, 15, 18, 25, 26, 34.

3 Despite a lack of any personal knowledge or other competent proof, Plaintiffs directly
4 accuse Director Wise of serious malfeasance, if not criminal offenses:

- 5 • "Plaintiffs are further informed and believe and thereon allege, that in November
6 2020, Director personally certified the County's tabulation results generated by
7 Uncertified Voting System for the Election, and that such act was in further error
8 or neglect under state and federal law." *Id.* at ¶15.
- 9 • "Plaintiffs are informed and believe and thereon allege, that Director engaged in
10 wrongful acts, errors and/or neglect of duty by allowing and/or facilitating
11 electronic manipulation of the voting results from the Election." *Id.* at ¶25
- 12 • "Plaintiffs are informed and believe and thereon allege, based on official electronic
13 tallies recorded and electronically reported and captured in real time, that
14 approximately 6,000 votes were flipped, over 400,000 votes were added, and/or
15 thousands of votes were removed in one or more state-wide races before, during,
16 and/or after the Election. *Plaintiffs are informed and believe and thereon allege,*
17 *that a portion of the state-wide vote flipping, additions and/or deletions occurred*
18 *in the County's Election overseen by Director."* *Id.* at ¶26 (emphasis added).
- 19 • "Plaintiffs are informed and believe and thereon allege, that Director engaged in
20 wrongful acts, errors and/or neglect of duty by allowing and/or facilitating: 1)
21 maintaining a record of County elector party preference in violation of RCW
22 29A.08.166; and/or 2) identifying ballots case by County electors in the Election
23 by Party preference." *Id.* at ¶34.

- 1 • “Plaintiffs are informed and believe and thereon allege, that Director engaged in
2 wrongful acts, errors, and/or neglect of duty by allowing and/or facilitating
3 loosely connected zip ties on ballot collection and/or storage boxes preventing a
4 secure chain of custody and allowing, *inter alia*, space for insertion and/or
5 removal of original ballots.” *Id.* at ¶ 42.

6 Based on these allegations, Plaintiffs seek damages and injunctive relief on various federal and
7 state constitutional theories, as well as damages under 42 U.S.C. §1983.

8 Plaintiffs essentially admit that they chose to file their complaint without evidence to
9 support their allegations even though such evidence might very well refute their claims:

10 Plaintiff WEiCU issued a records request for ballots ***to confirm or deny*** the
11 conduct and seeks a Court order compelling release of the public records, including a
12 Court order unsealing ballots under RCW 29A.60.110, for a full forensic audit conducted
 by Jovan Hutton Pulitzer, inventor of kinematic artifact detection and Maricopa County
 Arizona ballot auditor or approximately 2.1 million ballots.

13 Dkt. ____ (Complaint ¶5; emphasis added). In later portions of their complaint, Plaintiffs aver
14 that they have not received these ballots, but apparently opted to file the lawsuit anyway.

15 Likewise, all Plaintiffs decided to verify their complaint under penalty of perjury. Each
16 Plaintiff has filed the same verification form, which plainly indicates the limits of their
17 knowledge and the inadequacy of their inquiry despite the serious circumstances of this case.
18 Importantly, they admit that they have no personal knowledge apart from what they have been
19 told: “I am informed and believe that the matters stated [in the complaint] are true and correct
20 and on that ground I allege that the matters stated therein are true.” *Id.* (Complaint at pp. 22-27).
21 In essence, Plaintiffs swear to the allegations in the complaint merely because someone told
22 them that the allegations were true and they believed that person.
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1 (2) *the claims, defenses, and other legal contentions are warranted by existing*
2 *law or by a nonfrivolous argument for extending, modifying, or reversing existing law or*
3 *for establishing new law;*

4 (3) *the factual contentions have evidentiary support or, if specifically so*
5 *identified, will likely have evidentiary support after a reasonable opportunity for further*
6 *investigation or discovery; and*

7 (4) the denials of factual contentions are warranted on the evidence or, if
8 specifically so identified, are reasonably based on belief or a lack of information.

9 *Id.* (emphasis added). Each person who signs a complaint has a “personal, nondelegatable
10 responsibility’ to comply with the requirements of Rule 11 before signing a
11 complaint.” *O’Rourke*, 2021 WL 3400671, at *11 (quoting *Pavelic & LeFlore v. Marvel*
12 *Entertainment Group*, 493 U.S. 120, 127, 110 S.Ct. 456, 107 L.Ed.2d 438 (1989)).

13 If a person signs and files a pleading in violation of Rule 11, “the court may impose an
14 appropriate sanction on any . . . party that violated the rule or is responsible for the violation.”
15 Rule 11(c)(1). However, Rule 11 provides the opportunity for an offending party to correct their
16 error without facing a sanction. In accord with Rule 11(c) “safe harbor” provisions, the King
17 County Defendants have served each Plaintiff with an advance copy of this motion and waited
18 21 days before filing the motion with the court. Dkt. ____ (Decl. of Hackett). During this period,
19 each Plaintiff has had the opportunity to avoid sanctions by bringing themselves into compliance
20 with Rule 11.⁵ See *Sneller v. City of Bainbridge Island*, 606 F.3d 636, 638–39 (9th Cir. 2010)
21 (“Rule 11 sanctions may not be imposed if the challenged claim is withdrawn within 21 days
22 after service of the sanctions motion.”).

23 The Ninth Circuit has explained the test for determining when a *complaint* is filed in
violation of Rule 11:

⁵ The Court also has authority to sanction both litigants and attorneys under its inherent power.
de Borja v. Razon, 336 F.R.D. 620, 631 (D. Or. 2020).

1 When, as here, a “complaint is the primary focus of Rule 11 proceedings, a
2 district court must conduct a two-prong inquiry to determine (1) whether the complaint is
3 legally or factually baseless from an objective perspective, and (2) if the attorney has
4 conducted a reasonable and competent inquiry before signing and filing it.” *Christian v.*
5 *Mattel, Inc.*, 286 F.3d 1118, 1127 (9th Cir.2002) (internal quotations and citation
6 omitted). As shorthand for this test, we use the word “frivolous” “to denote a filing that
7 is *both* baseless *and* made without a reasonable and competent inquiry.” *Moore v.*
8 *Keegan Mgmt. Co (In re Keegan Mgmt. Co., Sec. Litig.)*, 78 F.3d 431, 434 (9th Cir.1996).
9 *Holgate v. Baldwin*, 425 F.3d 671, 675–76 (9th Cir. 2005). Rule 11 sanctions are governed by
10 “an objective standard of reasonable inquiry.” *De Borja*, 336 F.R.D. at 631. “Not all of a
11 complaint's claims must be frivolous for Rule 11 sanctions to be appropriate.” *Chao v. Westside*
12 *Drywall, Inc.*, 709 F. Supp. 2d 1037, 1080 (D. Or. 2010). Here, Plaintiff’s complaint violates
13 this standard.

14 **B. Plaintiffs Have Violated Rule 11 Because They Have No Colorable Legal Basis For**
15 **Standing.**

16 Plaintiffs complaint is legally baseless and it was filed despite substantial authority
17 rejecting standing that any reasonable and competent Plaintiffs’ inquiry should have revealed.
18 Even a cursory review of similar election conspiracy cases quickly demonstrates that they fail for
19 lack of standing. As pointed out in *O’Rourke* – a case that was available when Plaintiff’s filed
20 their complaint, “[t]he most patent deficiency in Plaintiffs’ wide-ranging, scatter-shot Complaint
21 was the individual Plaintiffs’ lack of standing.” 2021 WL 3400671, at *6–7. *Accord King v.*
22 *Whitmer*, 2021 WL 3771875, at *20 (At inception of lawsuit, Plaintiffs’ claims were barred by
23 standing.) Indeed, a “‘veritable tsunami’ of adverse precedent” precludes Plaintiffs’ standing to
bring their complaint, which raises only generalized complaints about the 2020 election that are
equally applicable to every registered voter and impacted Plaintiffs in the same way. *O’Rourke*,
2021 WL 3400671, at *8. Because Plaintiffs can claim no individualized injury different from

1 other voters, their complaint is legally deficient under Rule 11 for lack of standing and their lack
2 of any reasonable inquiry into the law merits sanctions.

3 **C. Plaintiffs Failed to Make An Adequate Factual Inquiry**

4 Similarly, Plaintiffs complaint is factually baseless and unsupported by any reasonable
5 and competent inquiry into facts. Under Rule 11, a plaintiff is required to make an inquiry into
6 the factual basis of a complaint that is “reasonable under the circumstances.” As pointed out in
7 *O’Rourke*, a person making a reasonable inquiry into the facts should have been on notice that
8 generalized allegations of election rigging and fraud are suspect:

9 Plaintiffs’ counsel should have been on notice as to the serious, publicly reported doubts
10 as to the validity of election-rigging or election fraud allegations, and the associated
11 importance of conducting extensive, objective, and independent due diligence before
12 filing. Given the circumstances of this case, it was not enough to merely accept as true (or
potentially true) what might be stated in the media, what had been pushed out over the
Internet, or even what was included in other lawsuits filed around the country. *Some
effort at independent verification by the lawyers who signed the Complaint was required.*

13 2021 WL 3400671, at *15 (emphasis added). The “circumstances” surrounding conspiratorial
14 challenges to the 2020 elections challenges involve a former President who refused to concede
15 an election that he lost, who actively worked with his allies to undermine American democracy,
16 and who incited an insurrection at the Capitol. *Id.* at *22.

17 These circumstances require a heightened degree of due diligence before waging a
18 challenge to a long-certified election: “Given the volatile political atmosphere and highly
19 disputed contentions surrounding the election both before and after January 6, 2021,
20 *circumstances mandated that Plaintiffs’ counsel perform heightened due diligence, research, and*
21 *investigation before repeating in publicly filed documents the inflammatory, indisputably*
22 *damaging, and potentially violence-provoking assertions about the election having been rigged*
23 *or stolen.” Id.* at *23 (emphasis added). Plaintiffs, who affirmatively chose to wade into these

1 murky and fetid waters, failed a normal inquiry into the facts, much less the heightened one that
2 was reasonable and competent under the circumstances. *See generally* Lewis and Sparks, *In*
3 *Defense of the Foundation Stone: Deterring Post-Election Abuse of the Legal Process*, 55 Ga L.
4 Rev. 1649 (Summer 2021) (“Rule 11 sanctions, statutory remedies, and other consequences must
5 be employed when litigants baselessly challenge election results, or the courts will find
6 themselves regularly enlisted in efforts to confer false legitimacy on misinformation
7 campaigns.”).

8 **1. Contrary to Rule 11, Plaintiffs Admit that they Lack Any Personal**
9 **Knowledge of Their Allegations.**

10 As noted above, Plaintiffs’ sworn verifications disavow any personal knowledge and
11 instead rely on what some unspecified and unnamed persons have told them. This is consistent
12 with the averments in the complaint, which similarly claim no instances of personal knowledge
13 by any Plaintiff. Without personal knowledge or any investigation into actual facts, Plaintiff’s
14 allegations amount to nothing more than rumor and innuendo. *See O’Rourke*, 2021 WL
15 3400671, at *28 (“Affidavits from one hundred fifty new plaintiffs who lacked personal
16 knowledge of any election fraud or conspiracy between Defendants, and who suffered no
17 particularized injury, added nothing to the lawsuit.”). An objectively reasonable factual inquiry
18 under Rule 11 requires far more than simply being told something by someone and believing that
19 it’s true.

20 **2. Rule 11 Does Not Allow a Plaintiff to Proceed on Their “Beliefs” Alone**

21 Both in the complaint and in their verifications, Plaintiffs acknowledge that the
22 allegations in the complaint merely constitute their personal “beliefs.” However, “an ‘empty-
23 head’ but ‘pure-heart’ does not justify lodging patently unsupported factual assertions.” *King v.*
Whitmer, 2021 WL 3771875 at *24. Plaintiffs have undertaken no factual inquiry, much less a

1 reasonable one. As a result, they should be sanctioned for filing a complaint in violation of Rule
2 11. *See In re Kunstler*, 914 F.2d 505, 515–16 (4th Cir. 1990) (Representing allegations in a
3 complaint as the “beliefs” of a party does not avoid Rule 11 sanctions.).

4 **3. Plaintiff’s Violate Rule 11 By Filing a Complaint Where Factual Allegations**
5 **are Based on a Planned Future Review of Ballots that is Foreclosed by**
6 **Binding Precedent**

7 In their complaint, Plaintiffs freely admit that *they cannot prove their core allegations of*
8 *election fraud without access to the ballots* from the 2020 election. Dkt. ____ (Complaint at ¶5).
9 They cite non-Washington law to claim that the ballots “are public records and subject to
10 inspection.” *Id.* at ¶55. However, binding Washington precedent completely forecloses
11 Plaintiffs’ access to the ballots and their so-called “audit.”⁶ Tabulated ballots are not subject to
12 public disclosure under the PRA. *White v. Clark Cty.*, 199 Wash. App. 929, 934, 401 P.3d 375,
13 378 (2017), *rev. denied* 189 Wn.2d 1031 (2018). Because *White* is controlling law, Plaintiffs’
14 decision to make wild allegations of election fraud by Director Wise that they can only prove or
15 disprove with ballots that are unavailable to them is objectively unreasonable. *See In re*
16 *Kunstler*, 914 F.2d 505, 516 (4th Cir. 1990) (“The need for discovery to complete the factual
17 basis for alleged claims is not an excuse to allege claims with no factual basis.”).
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21 ⁶ Subject to strict time limits, Washington law allows orderly challenges to election results. For
22 example, a recount under statutory procedures may be requested within two business days after
23 the county canvassing board has declared the official results of an election. RCW 29A.64.011.
No later than 10 days following election certification, an elector may contest an election by
initiating a court proceeding by affidavit and claiming a wrongful act, neglect or error by
elections officials. RCW 29A.68.013. Plaintiffs request for their own “audit” falls well outside
these statutory procedures and statutory limitations periods.

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V. CONCLUSION

Plaintiffs' complaint challenging the 2020 election violates the requirements of Rule 11. This court should follow District Judges in Colorado and Michigan by sanctioning their behavior. Plaintiffs should be held jointly and severally liable for attorney fees and costs incurred by King County in this matter in defending against Plaintiffs' non-PRA claims.

DATED this 21st day of October, 2021.

DANIEL T. SATTERBERG
King County Prosecuting Attorney

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